



Planning and Zoning

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TCGP 2019-01

Resource Management Plan Amendment Proposed Management Areas for Inventoried Roadless Areas

Public Body: Tooele County Planning Commission

Meeting Date: March 6, 2019

Request: General Plan Amendment for the Tooele County Resource Management Plan

Planners: Jeff Miller

Planning Commission Recommendation: Not yet received

Planning Staff Recommendation: Approval

Applicant Name: Tooele County Planning Staff

PROJECT DESCRIPTION

Planning Staff and the Tooele County Commission has been working with Utah's Public Lands Policy Coordinating Office to propose updates to the Tooele County Resource Management Plan regarding Inventoried Roadless Areas (IRAs) and identifying appropriate classifications for the management of these areas.

The State of Utah is in the process of submitting a request to the United States Department of Agriculture for a new, Utah-specific "Roadless Rule". All counties within the state have been requested to provide feedback on the Roadless Rule Petition and make updates to their associated Resource Management Plans.

Proposed Amendment to the Tooele County Resource Management Plan

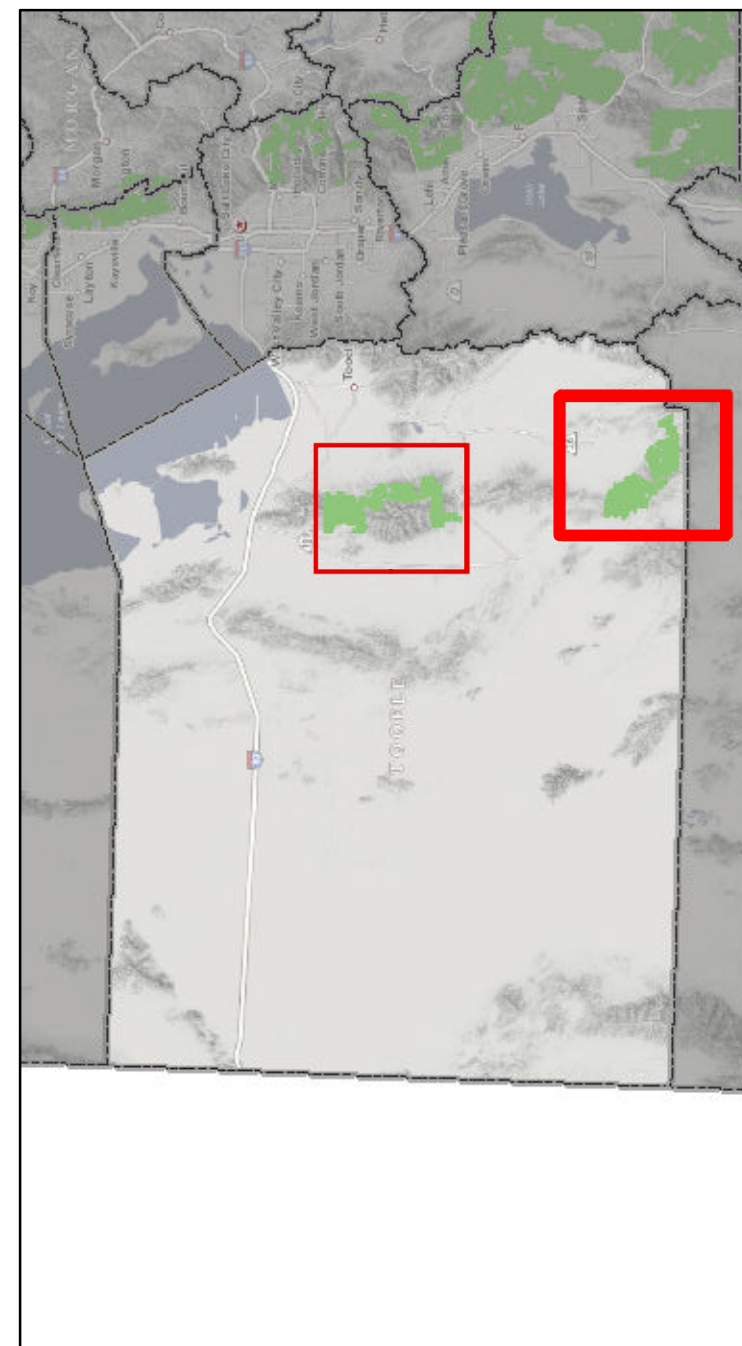
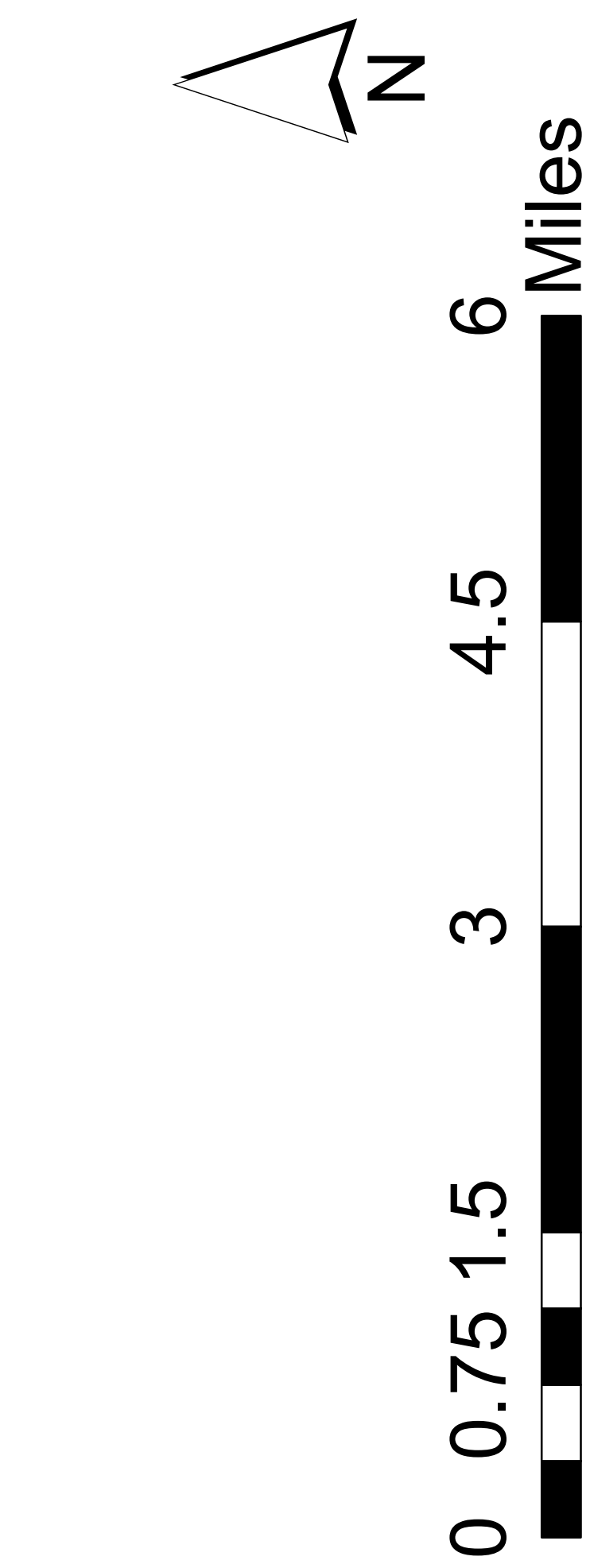
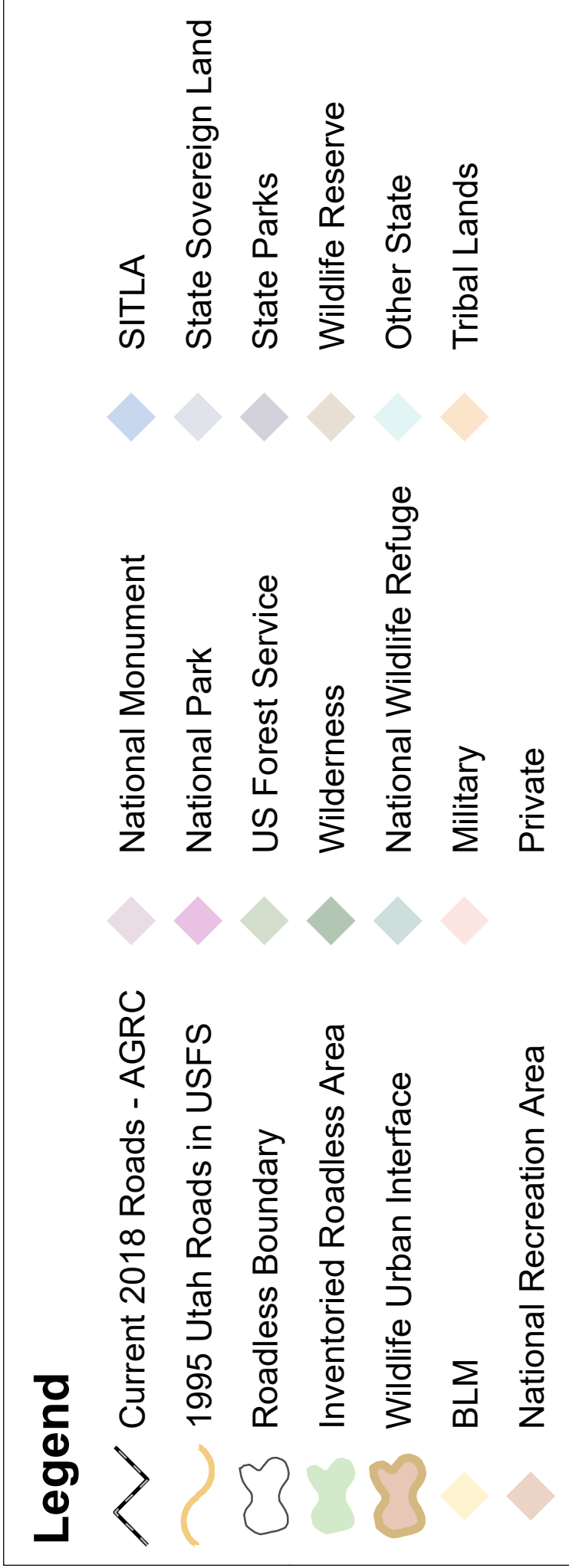
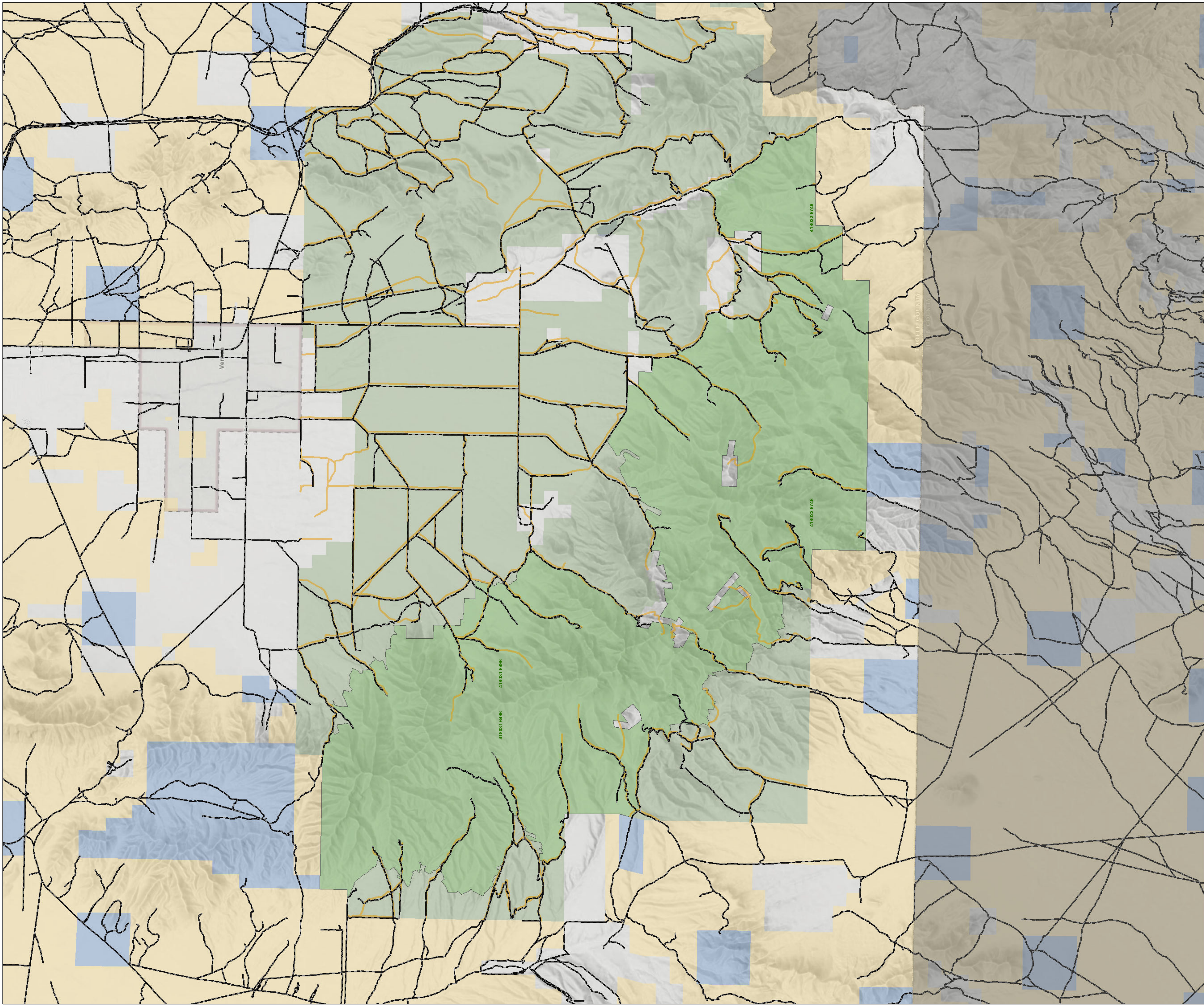
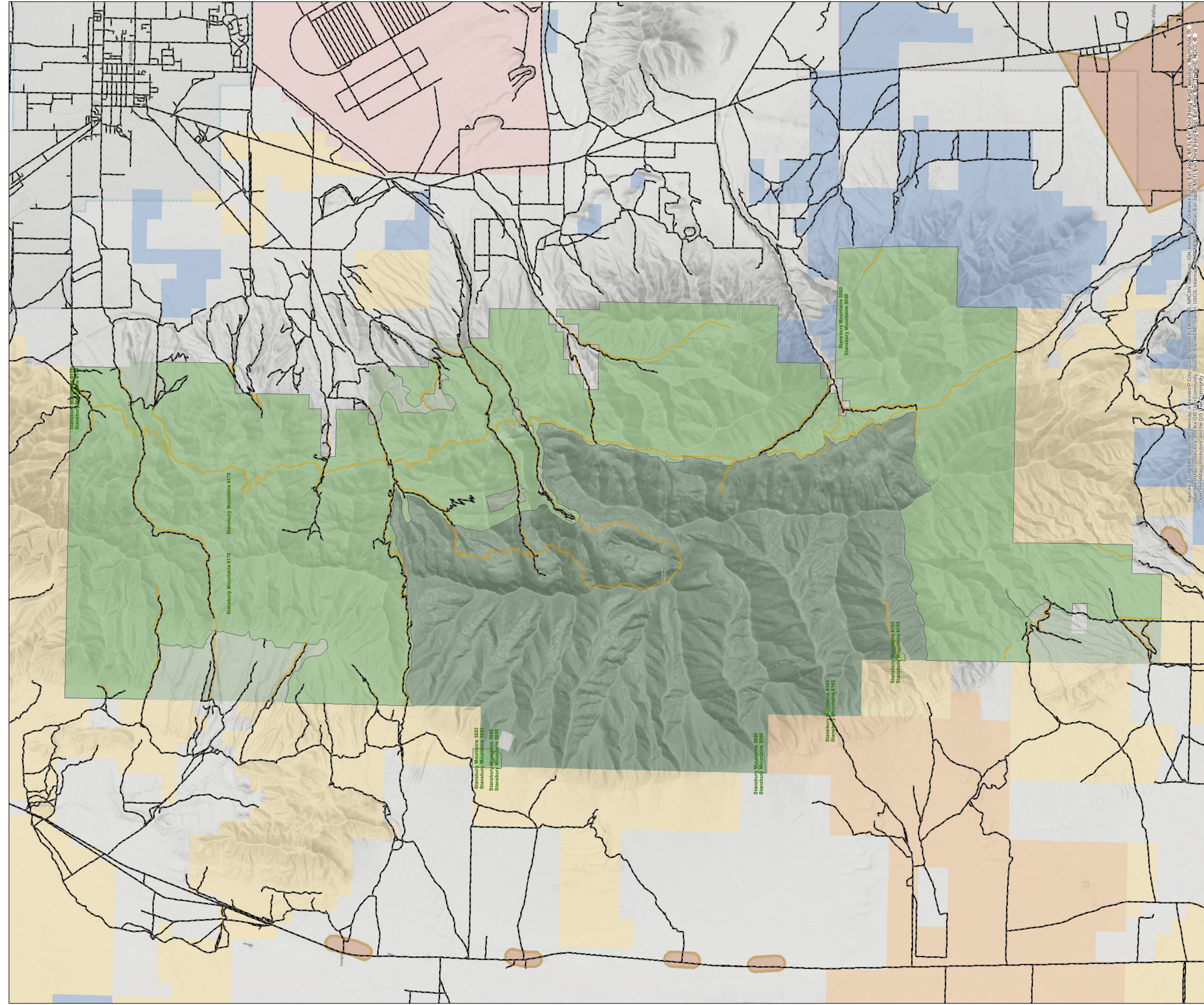
The following items have been attached to this staff report:

- Map of the Inventoried Roadless Areas in Tooele County.
- Proposed amendment to the Tooele County Resource Management Plan.
- General information regarding the Roadless Rule Petition.
- Letter of intent from the Tooele County Commission.

PLANNING STAFF ANALYSIS AND RECOMMENDATION

Planning Staff recommends that the Tooele County Planning Commission makes a motion to recommend approval of the proposed general plan amendments to the Tooele County Resource Management Plan regarding the management of Inventoried Roadless Areas (IRAs).

Tooele County - Inventoried Roadless Areas



Tooele County Resource Management Plan

Proposed Management Areas

Management Areas – Most Restrictive to Least Restrictive

1. Primitive Areas
2. Forest Restoration Areas
3. Forest Stewardship Areas
4. Boundary Adjustment/Re-Inventory Areas

Brief Summary of Management Areas

1. Primitive Areas – follows existing management

- a. Primitive Areas represent the same management that currently occurs in Roadless Areas under the 2001 Roadless Rule, 36 C.F.R. § 294. Road construction and reconstruction will be prohibited, except under certain circumstances such as when needed to protect public health and safety in cases of an imminent threat of flood or fire. The cutting, sale, or removal of timber will be prohibited except in special circumstances, such as reducing the risk of uncharacteristic wildfire effects. Timber cut, sold, or removed under these exceptions will generally be small diameter. Road construction/reconstruction to facilitate mining activities is prohibited (beyond valid existing rights). Public motorized travel limited to routes designated by Forest Travel Plan.

2. Forest Restoration Areas – moderate flexibility

- a. Preference toward temporary road construction with mitigation, commercial timber harvest allowed for forest health reasons only, temporary road construction/reconstruction to facilitate permitted mining activities is allowed. Public motorized travel limited to routes designated by Forest Travel Plan.

3. Forest Stewardship Areas – high flexibility

- a. Permanent road construction is allowed (although temporary roads are preferred). A full range of silviculture techniques and road construction/reconstruction to facilitate permitted mining activities is allowed. Public motorized travel limited to routes designated by Forest Travel Plan.

4. Boundary Adjustment/Re-Inventory Areas

- a. These areas should either have boundaries adjusted or be removed entirely from the Roadless Rule due to high presence of roads, motorized trails, energy infrastructure, and other features that disrupt roadless values. Also may include some areas that are smaller than 5,000 acres and do not meet the size threshold for Roadless Areas under the 2001 Roadless Rule.

Comparison Table of Suitable Uses in Management Areas

Suitable Use/Activity	Primitive Area	Forest Restoration Area	Forest Stewardship Area	Re-Inventory/ Boundary Adjustment Area
Fire Management	Yes ¹	Yes ²	Yes ³	
Forest Health	Yes ⁴	Yes ⁵	Yes ⁶	
Timber Cutting	No ⁷	Yes ⁸	Yes ⁹	
Grazing	Yes	Yes	Yes	
Motorized Travel	Yes ¹⁰	Yes ¹¹	Yes ¹²	

¹ Prescribed fire, cutting, sale, and removal of generally small diameter timber when need to reduce the risk of uncharacteristic wildfire effects, in accordance with 36 C.F.R. § 294.13. Timber cutting/removal expected to be infrequent.

² Prescribed fire, proper silviculture practices (including cutting, sale, and removal) when needed to reduce the risk of uncharacteristic wildfire effects.

³ Prescribed fire, proper silviculture practices (including cutting, sale, and removal) when needed to reduce the risk of uncharacteristic wildfire effects.

⁴ Cutting, sale, or removal of generally small diameter timber allowed when needed to maintain or restore the characteristics of ecosystem composition and structure, or to improve habitat for threatened, endangered, proposed, or sensitive species, in accordance with 36 C.F.R. § 294.13. Timber cutting, sale, and removal expected to be infrequent.

⁵ Cutting, sale, and removal of timber allowed using proper silviculture practices when needed to maintain or restore the characteristics of ecosystem composition and structure, or to improve habitat for threatened, endangered, proposed, or sensitive species. Includes timber cutting, sale, and removal that may require temporary road construction/reconstruction wider than 50 inches.

⁶ Full range of silviculture techniques, including silviculture techniques that may require new road construction/reconstruction wider than 50 inches.

⁷ The cutting, sale, or removal of timber is allowed when needed and appropriate for personal or administrative use (see 36 C.F.R. part 223), or under exceptions listed in 36 C.F.R. §294.13(b).

⁸ The cutting, sale, or removal of timber is allowed for forest health purposes, as well as for personal or administrative use, or under exceptions listed in 36 C.F.R. §294.13(b).

⁹ Full range of silviculture techniques for forest health or commercial purposes, including silviculture techniques that require new road construction/reconstruction wider than 50 inches.

¹⁰ Public motorized access subject to existing Forest Travel Plans.

¹¹ Public motorized access subject to existing Forest Travel Plans.

¹² Public motorized access subject to existing Forest Travel Plans.

Road Construction/Reconstruction to facilitate mining activities	No ¹³	No ¹⁴	Yes ¹⁵	
Recreation	Yes	Yes	Yes	
Road Construction and/or Reconstruction (i.e. over 50 inches wide)	No ¹⁶	Yes ¹⁷	Yes ¹⁸	
Trail Construction and/or Reconstruction	Yes	Yes	Yes	
Weed/Pest Management	Yes	Yes	Yes	
Mechanized Equipment Use	Yes ¹⁹	Yes	Yes	

Detailed Description of Management Areas

¹³ Road construction/reconstruction to facilitate permitted mining activities prohibited, subject to the exceptions listed in 36 C.F.R. §294.12(7).

¹⁴ Road construction/reconstruction to facilitate permitted mining activities prohibited, subject to the exceptions listed in 36 C.F.R. §294.12(7).

¹⁵ Construction/reconstruction of temporary administrative roads to facilitate permitted mining activities allowed. Road construction or reconstruction associated with mining activities must minimize effects on surface resources and may only be approved after evaluating other access options.

¹⁶ Road Construction/reconstruction prohibited, subject of exceptions found in 36 C.F.R. §294.12(b).

¹⁷ Preference toward temporary administrative road construction with mitigation; however, permanent administrative road construction permissible based on long-term management and ecological need, particularly if a road is needed to protect public health and safety in cases of a threat of flood, uncharacteristic wildfire, or other catastrophic event, including long term threats.

¹⁸ Permanent administrative roads are compatible, particularly when needed to maintain or restore the characteristics or ecosystem composition and structure, such as to reduce the risk of uncharacteristic wildfire effects.

¹⁹ Chainsaws, helicopters, other mechanical equipment that does not require the use of new trails wider than 50 inches.

Management Area #1: Primitive Areas

Current Condition: Areas managed as Primitive Areas show little evidence of historical or human use. Natural processes are predominant. People visiting these areas can find outstanding opportunities for recreation, including exploration, solitude, risk, and challenge. Primitive Areas represent the same management that currently occurs in Roadless Areas under the 2001 Roadless Rule, 36 C.F.R. § 294.

Desired Future Condition: Areas managed as Primitive Areas will continue to show little evidence of historical or human use. As such, the natural processes of the area will continue to predominate, which will allow visitors to enjoy the same type of primitive recreation opportunities they found in the past.

Management Focus: These areas shall be managed to protect the primitive recreation opportunities of the area. Only activities and management actions not deemed an irretrievable commitment of resources will be considered suitable uses.

Watershed and Vegetative Restoration: Watershed and vegetative restoration shall be accomplished through passive, natural ecological processes.

Mechanized Uses: Mechanized uses (e.g. chainsaws, helicopters, and equipment that does not require the use of new routes wider than 50 inches, etc.) shall be allowed in these areas unless said use constitutes an irretrievable commitment of resources.

Primitive Area Suitable Uses and Activities

Available Use/Activity	Yes	No	Notes
Fire Management	X		Prescribed fire, cutting, sale, and removal of generally small diameter timber when need to reduce the risk of uncharacteristic wildfire effects, in accordance with 36 C.F.R. § 294.13. Timber cutting/removal expected to be infrequent.
Forest Health	X		Cutting, sale, or removal of generally small diameter timber allowed when needed to maintain or restore the characteristics of ecosystem composition and structure, or to improve habitat for threatened, endangered, proposed, or sensitive species, in accordance with 36 C.F.R. § 294.13. Timber cutting, sale, and removal expected to be infrequent.

Timber Cutting		X	Personal or administrative use only, or under exceptions found in 36 C.F.R. §294.13(b).
Grazing	X		
Motorized Travel	X		Public motorized access subject to existing Forest Travel Plans.
Road Construction/Reconstruction to facilitate mining activities		X	Road construction/reconstruction to facilitate permitted mining activities prohibited, subject to the exceptions listed in 36 C.F.R. §294.12(7).
Recreation	X		
Road Construction and/or Reconstruction (i.e. over 50 inches wide)		X	Road Construction/reconstruction prohibited, subject of exceptions found in 36 C.F.R. §294.12(b).
Trail Construction and/or Reconstruction	X		
Weed/Pest Management	X		
Mechanized Equipment Use	X		Chainsaws, helicopters, etc.

Inventoried Roadless Areas (IRAs) Recommended for Management as Primitive Areas:

Tooele County does not have any IRAs recommended for management as Primitive Areas.

Management Area #2: Forest Restoration Areas

Current Condition: Forest Restoration Areas includes areas where evidence of human use may or may not be present. Generally, few constructed features exist with the exception of trails and lookouts. These areas may also show some evidence of vegetative manipulation. Like the primitive areas, Forest Restoration Areas include a broad range of terrain and vegetative types.

Desired Future Condition: While areas managed as Forest Restoration Areas may display increased evidence of management activities, these areas will generally retain their roadless character.

Management Focus: Forest Restoration Areas will be managed to provide a variety of recreation opportunities, while also ensuring adequate flexibility to maintain forest health. These areas may include trailheads and recreational sites (developed and dispersed). Depending on specific National Forest Travel Plans, these areas may be managed for summer and/or winter motorized recreation opportunities. Lastly, due to the increased management flexibility afforded to these areas, fish and game can potentially benefit from carefully conducted habitat manipulation.

Watershed and Vegetative Restoration: Watershed and vegetative restoration will be accomplished through a combination of active management and natural processes. Both active and passive management restoration activities (and in some cases use restrictions) may occur to address specific habitat needs of fish and wildlife.

Forest Management Area Suitable Uses and Activities

Available Use/Activity	Yes	No	Notes
Fire Management	X		Prescribed fire, proper silviculture practices (including cutting, sale, and removal) when needed to reduce the risk of uncharacteristic wildfire effects.
Forest Health	X		Cutting, sale, and removal of timber allowed using proper silviculture practices when needed to maintain or restore the characteristics of ecosystem composition and structure, or to improve habitat for threatened, endangered, proposed, or sensitive species. Includes timber cutting, sale, and removal that may require temporary road construction/reconstruction wider than 50 inches.
Timber Cutting	X	X	The cutting, sale, or removal of timber is allowed for forest health purposes, as well as for personal or administrative use, or under exceptions listed in 36 C.F.R. §294.13(b).
Grazing	X		
Motorized Travel	X		Public motorized access subject to existing Forest Travel Plans.
Road Construction/Reconstruction to facilitate mining activities		X	Road construction/reconstruction to facilitate permitted mining activities prohibited, subject to the exceptions listed in 36 C.F.R. §294.12(7).
Recreation	X		
Road Construction and/or Reconstruction (i.e. over 50 inches wide)	X		Preference toward temporary administrative road construction with mitigation; however, permanent administrative road construction permissible based on long-term ecological need, particularly if a road is needed to

			protect public health and safety in cases of a threat of flood, uncharacteristic wildfire, or other catastrophic event, including long term threats.
Trail Construction and/or Reconstruction	X		
Weed/Pest Management	X		
Mechanized Equipment Use	X		

IRAs Recommended for Management as Forest Restoration Areas:

Tooele County does not have any IRAs recommended for management as Forest Restoration Areas.

Management Area #3: Forest Stewardship Areas

Current Condition: Forest Stewardship areas include locations that may display high levels of human use including roads, facilities, evidence of vegetative manipulation (e.g. silvicultural treatments, grazing) and mineral exploration/extraction. These areas also encompass a broad range of terrain and vegetative types, and may be comprised of forest, grasslands, rangelands, or a combination thereof.

Desired Future Condition: These areas may over time display increased levels of human use including roads, facilities, and evidence of vegetative manipulation. Forest Stewardship areas will also include evidence of watershed restoration and/or mitigation activities. Despite higher levels of human use than Forest Restoration Areas, Forest Stewardship Areas will still retain some of their roadless qualities. In other words, an area designated as “Forest Stewardship” will not necessarily reflect all the characteristics of non-roadless forest lands.

Management Focus: Forest Stewardship areas will be managed to provide a variety of goods and services, broad range of recreational opportunities including both motorized and non-motorized, while also ensuring adequate flexibility to maintain forest, rangeland, and/or grassland health.

Watershed and Vegetative Restoration: Watershed and vegetative restoration shall be accomplished primarily through active management, including timber harvest, salvage, fuels reduction, projects, and grazing.

Forest Stewardship Area Suitable Uses and Activities

Available Use/Activity	Yes	No	Notes
Fire Management	X		Prescribed fire, proper silviculture practices (including cutting, sale, and removal) when needed to reduce the risk of uncharacteristic wildfire effects.
Forest Health	X		Full range of silviculture techniques, including silviculture techniques that may require new road construction/reconstruction wider than 50 inches.
Timber Cutting	X		Full range of silviculture techniques for forest health or commercial purposes, including silviculture techniques that require new road construction/reconstruction wider than 50 inches.
Grazing	X		
Motorized Travel	X		Public motorized access subject to existing Forest Travel Plans.
Road Construction/Reconstruction to facilitate mining activities	X		Construction/reconstruction of temporary administrative roads to facilitate permitted mining activities allowed. Road construction or reconstruction associated with mining activities must minimize effects on surface resources and may only be approved after evaluating other access options.
Recreation	X		
Road Construction and/or Reconstruction (i.e. over 50 inches wide)	X		Permanent administrative roads are compatible, particularly when needed to maintain or restore the characteristics or ecosystem composition and structure, such as to reduce the risk of uncharacteristic wildfire effects.
Trail Construction and/or Reconstruction	X		
Weed/Pest Management	X		
Mechanized Equipment Use	X		

IRAs Recommended for Management as Forest Stewardship Areas:

COUNTY	ID	NAME	FOREST	MANAGEMENT CATEGORY	COMMENTS/ DESCRIPTION
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TOOELE	5550	Stansbury Mountains	Wasatch-Cache	Forest Stewardship Area (3)	South and Southeast region of the Stansbury Mtn – Continue current management practices
TOOELE	5553	Stansbury Mountains	Wasatch-Cache	Forest Stewardship Area (3)	North central corner of the Stansbury Mtn wilderness – Continue current management practices
TOOELE	5555	Stansbury Mountains	Wasatch-Cache	Forest Stewardship Area (3)	A small segment associated with a mine in the northwest central corner of the Stansbury Mtn wilderness
TOOELE	5860	Stansbury Mountains	Wasatch-Cache	Forest Stewardship Area (3)	Antelope Canyon area – west Central Stansbury Skull Valley side – Continue current management practices
TOOELE	6143	Stansbury Mountains	Wasatch-Cache	Forest Stewardship Area (3)	Mouth of Indian Hickman – West southwest corner of the wilderness area – Continue current management
TOOELE	6153	Stansbury Mountains	Wasatch-Cache	Forest Stewardship Area (3)	Mouth of Dry Creek – West southwest corner of the wilderness area – Continue current management practices

TOOELE	6178	Stansbury Mountains	Wasatch-Cache	Forest Stewardship Area (3)	Bakers Canyon, Miners Fork Area North end of the Stansbury – Continue current management practices
TOOELE	6179	Stansbury Mountains	Wasatch-Cache	Forest Stewardship Area (3)	West Canyon Area North end of the Stansbury – Continue current management practices
TOOELE	6496	418031	Uinta	Forest Stewardship Area (3)	Northwest Sheeprock Mountains – Continue current management practices
TOOELE	6746	418022	Uinta	Forest Stewardship Area (3)	Southeast Sheeprock Mountains – Continue current management practices

Management Area #4: Areas Recommended for Boundary Adjustments or Re-inventory

The State requests a re-inventory or boundary adjustments of some Inventoried Roadless Areas found not in conformity with the requirements for “roadless” designation as defined in the FEIS Nov. 2002, Volume 1 (i.e. “Undeveloped areas typically exceeding 5,000 acres that met the minimum criteria for wilderness consideration under the Wilderness Act . . .”). Boundary adjustment may include consolidation of existing Inventoried Roadless Areas. Some areas may necessitate boundary correction based on new information. If the Forest Service finds after re-inventory that certain areas are not in conformity with the requirements for roadless designations, such areas should be managed in accordance with the relevant forest plan.

IRAs Recommended for Boundary Adjustments or Re-inventory:

Tooele County does not have any IRAs recommended for Boundary Adjustments or Re-inventory.

DRAFT

UTAH'S ROADLESS RULE PETITION – BRIEFING POINTS

FROM: UTAH PUBLIC LANDS POLICY COORDINATING OFFICE

DATE: SEPTEMBER 10, 2018

A. What is the Roadless Rule?

- The Roadless Area Conservation Rule (better known as the Roadless Rule) is a 2001 Forest Service regulation that restricts road building and, consequently, many types of active forest management, on certain Forest Service lands.
- Approximately 49% of Utah's National Forests, over 4 million acres, are regulated by the Roadless Rule.

B. What is Utah's "Roadless Rule Petition"?

- The State of Utah is developing a request, or "petition," for a Utah-specific version of the Forest Service's Roadless Rule that would allow for more active forest management within roadless areas.
- If adopted, the Utah-specific regulation would still be administered by the Forest Service and most of these areas would still be categorized as "Roadless," but under best forest management practices.

C. Why does Utah want to ask the Forest Service for a Utah-specific Roadless Rule?

- A Utah-specific roadless rule would give the local Forest Service districts more flexibility to manage the unique challenges in Utah's roadless areas, promote healthy forests, and mitigate catastrophic wildfires.
- Many of Utah's roadless forests suffer from bark beetle-infestations, excessive buildup of deadfall and ladder fuels, excessive tree density, pinyon-juniper encroachment into sagebrush habitat, and other symptoms of poor forest health.
- These conditions can impair watershed health, degrade wildlife habitat, and increase risks of catastrophic wildfires.
- Catastrophic wildfires pose extreme risks to Utah's air quality, water quality, wildlife, recreation, and private property in the "wildland-urban interface."
- A Utah-specific roadless rule would give the Forest Service greater flexibility to remove deadfall and ladder fuels, cut beetle-infested trees, minimize pinyon-juniper encroachment, and thin overgrown stands in Forest Service roadless areas.
- Such projects in roadless areas will help safeguard Utah's watersheds, air quality, wildlife, and resiliency to catastrophic wildfires.

D. What is the process for petitioning the Forest Service for a Utah-specific rule?

- The State will develop a proposal for a new Utah-specific rule, which will be sent to the Forest Service, after which the Forest Service will consider the State's proposal through its full rulemaking and NEPA process.
- The State is seeking input from all twenty-nine of Utah's counties on how the Roadless Areas within each county should be managed.
- The State is also seeking public input and hosting public meetings for each national forest around the State.
- After input from counties, the public, and other stakeholders has been received, the State will develop a final petition to be sent to the U.S. Department of Agriculture.
- Counties, the public, and stakeholders should submit input to the State throughout the fall of 2018 so that the State can submit its final petition to the U.S. Department of Agriculture by December 31, 2018.
- The States is asking counties to submit their recommendations through the official planning and zoning process and also adopt their roadless rule recommendations as part of their respective County Resource Management Plans.
- After the State has submitted its final petition to the Forest Service, the Forest Service will decide whether to accept the State's petition and will likely initiate the development of a new Utah-specific Roadless Rule with an accompanying environmental impact statement (EIS).
- The State anticipates working closely with the Forest Service as a "cooperating agency" throughout the development of the EIS.
- Ultimately, the Forest Service will decide whether to adopt the State's proposal into a Utah-specific Roadless Rule.

E. What will Utah's petition for a Utah-specific Roadless Rule look like?

- The State is proposing that existing Roadless Areas be analyzed for categorization into one of four difference "management areas," each of which would permit a different level of active forest management. The four proposed management areas are:
 1. Primitive Areas
 2. Forest Restoration Areas
 3. Forest Stewardship Areas
 4. Re-Inventory/Boundary Adjustment Areas
- **Primitive Areas:** the most restrictive management category, Primitive Areas would be Roadless Areas where road construction is prohibited, timber management is for personal use only, mineral development (beyond valid existing rights) is prohibited, and motorized travel is limited to existing routes.
- **Forest Restoration Areas:** a moderately restrictive category, Forest Restoration Areas would have a preference toward temporary road construction with mitigation,

commercial timber harvest allowed for forest health reasons only, mineral extraction allowed, and motorized travel limited to existing routes.

- **Forest Stewardship Areas:** as the least restrictive management category, Forest Stewardship Areas would allow permanent road construction (although temporary roads are preferred), a full range of silviculture techniques, mineral extraction, and motorized travel subject to Forest Travel Plan.
- **Re-Inventory/Boundary Adjustment Areas:** these areas would be recommended to the Forest Service for re-inventory and potential removal from the Roadless Rule (or adjustment of existing boundaries). These would be areas with a high presence of roads, motorized trails, energy infrastructure, and other features that disrupt roadless values. Also would include roadless areas that are smaller than 5,000 acres and thus do not meet the Roadless Area size threshold.

F. Comparison Table of Suitable Uses in Proposed Management Areas

Suitable Use/Activity	Primitive Area	Forest Restoration Area	Forest Stewardship Area	Re-Inventory/Boundary Adjustment Area
Fire Management	Yes ¹	Yes ¹	Yes	
Forest Health	Yes	Yes ²	Yes ³	
Intensive Timber Management	No ⁴	No ⁵	Yes ³	
Grazing	Yes	Yes	Yes	
Motorized Travel	Yes ⁶	Yes ⁷	Yes ⁸	
Minerals	No	Yes	Yes	
Recreation	Yes ⁹	Yes	Yes ¹⁰	
Road Construction and/or Reconstruction	No ¹¹	Yes ¹²	Yes ¹³	

¹ Prescribed fire

² Vegetation treatments

³ Full range of silviculture techniques

⁴ Personal use only

⁵ Commercial use allowed for forest health reasons only

⁶ Currently existing routes

⁷ Preference toward temporary road construction with mitigation; however, permanent road construction

⁸ Subject to Forest Travel Plan

⁹ Dispersed

¹⁰ Dispersed and/or developed

¹¹ No roads

¹² Preference toward temporary road construction with mitigation; however, permanent road construction permissible based on long-term ecological need

¹³ New temporary roads are preferred, but permanent roads are compatible

Trail Construction and/or Reconstruction	Yes ¹⁴	Yes	Yes	
Weed/Pest Management	Yes	Yes	Yes	
Mechanized Equipment Use	Yes ¹⁵	Yes	Yes	

G. Will Utah assume more management responsibilities if the petition is successful?

- No, a successful Roadless Rule petition would have no impact on the Forest Service's role of land manager, and would not grant the State any responsibilities that it does not already have.

H. Who will fund forest management activities if the petition is successful?

- Funding for forest management activities will still come from the same federal and state sources available today.
- A successful roadless rule petition will simply give forest managers more flexibility to conduct forest management projects (in some roadless areas where they are currently restricted) using existing best management practices and funding mechanisms.

I. Will a successful petition impose additional requirements on the Forest Service?

- No, a successful roadless rule petition would give Forest Service districts more options and flexibility to perform management activities in areas where such activities are currently restricted
- A Utah-specific Roadless Rule will not require the Forest Service to conduct any specific activities or infringe on the Forest Service's discretion.
- Specific management projects will still go through the Forest Service's full NEPA process prior to implementation.

J. Have other states successfully petitioned the Forest Service for a state-specific rule?

- Yes, Idaho and Colorado successfully petitioned the Forest Service for state specific roadless rules in 2008 and 2012, respectively.
- The Forest Service is currently reviewing a petition submitted by Alaska.

K. Is the goal of the State to open up more roads in roadless areas to motorized use?

¹⁴ Permissible if under 50 inches wide

¹⁵ Chainsaws, helicopters, etc.

- No. The State intends to submit a petition that would authorize limited road construction in some roadless areas with the primary purpose of promoting forest health and conducting effective management activities.
- Most new roads authorized under a Utah-specific Roadless Rule would likely be either reclaimed or gated when not needed for forest health activities.
- Some new roads authorized under a Utah-specific Roadless Rule could remain open both for forest management as well as for public access and recreational use.

L. Does Utah want to authorize indiscriminate logging in roadless areas?

- No. Utah's request to the Forest Service is fully intended to provide forest managers greater flexibility with which to improve forest health.
- In limited circumstances, selective harvest could be allowed as a tool to improve forest health.

M. Won't the forest be healthiest if it is just left alone?

- Not necessarily – forests are complicated ecosystems and a combination of climate change, drought, historic wildfire suppression, and other factors have left many of Utah's forests in unhealthy conditions.
- Current unhealthy forest conditions o
-
- often impair wildlife habitat, harm watersheds, and increase risk of catastrophic wildfires that endanger public safety. Active forest management is often necessary to preserve forest health. A Utah-specific Roadless Rule will be designed to facilitate necessary forest management activities where needed.
- Catastrophic wildfires that are the result of unhealthy forest conditions pose serious risks to air quality, drinking water, infrastructure, homes, and human life.

N. Will the State's petition impact wilderness areas?

- No, wilderness areas are designated by Congress and are beyond the scope of Utah's petition. Roadless areas are outside designated wilderness areas and a Utah-specific roadless rule will not authorize any new activities within wilderness areas.



Public Lands Policy Coordinating Office
Attn: Kathleen Clarke
5110 State Office Building
PO Box 141107
Salt Lake City, Utah 84114-1107

Dear Director Kathleen Clarke:

Tooele County appreciates the opportunity to participate in the State of Utah's Roadless Rule Petition. After reviewing the current inventoried roadless areas and the proposed draft management categories, Tooele County has prepared the following draft recommendations for the State to utilize for the petition process, which spreadsheet is attached hereto as Attachment 1.

Tooele County intends to take the draft recommendations through a Planning and Zoning Commission meeting scheduled for March 6, 2019, then seek final approval of the recommendations through our County Commission meeting scheduled for March 19, 2019. After the recommendations are approved by the Commission, we will include the recommendations as part of our County Resource Management Plan. If we have any revisions from these draft recommendations, after listening to public comments at the two public meetings, we will forward those changes to your office for consideration.

Proper forest management is important to Tooele County to benefit our watersheds, wildlife, and protect our homes and property from catastrophic wildfire. We will continue to work with impacted stakeholders to develop strategies that maintain and improve our Forest Service lands throughout the County.

We hope to participate throughout the petition process as the State works collaboratively with the Forest Service to improve our forests throughout the State and County. If you have any questions, please feel free to reach out.

Sincerely,

Tom Tripp
Chairman, Tooele County Commissioner
ttripp@tooeleco.org

cc	Braden Shepard	Shawn Milne
	Redge Johnson	Kendall Thomas